

## Remarks/Arguments

Claims 1-11 and 13-22 remain in this application.

Claim 1, and all remaining claims by virtue of dependency, have been amended to recite the limitation of prior claim 25 (presently cancelled), that the mapping of the at least two entities onto a surface is “by two-way document/topic iteration logic.” Support for this amendment is found in the paragraph bridging pages 8 and 9, and in prior claim 25. No new matter is added thereby.

The applicant’s amendment of claim 1, and all remaining claims by virtue of dependency, renders the examiner’s rejection of claims 1-11 and 13-22 moot. Since claim 1 now incorporates the limitation of prior claim 25, (that the mapping of the at least two entities onto a surface is “by two-way document/topic iteration logic”), the only remaining issue is whether the examiner set forth a *prima facie* case of anticipation with respect to prior claim 25, and whether the only prior art cited by the examiner, Cox et al., US Patent no. 5,751,931, provided the basis for anticipation of prior claim 25 under 35 USC 102 (e), because if prior claim 25 meets the statutory criteria for patentability, then amended claim 1, and all of the remaining claims by virtue of dependency, meet the standard as well. As explained below, the examiner did not set forth a *prima facie* case of anticipation with respect to prior claim 25, and Cox et al. does not provide the basis for a *prima facie* case of anticipation for the now amended claim 1.

At the outset, Cox et al. is entirely unconcerned with any method whatsoever for mapping entities wherein the entities are derived from document based databases, as is inherent in the step of mapping entities onto a surface by two-way document/topic iteration logic. Rather, Cox’s entities, or “nodes” as they are termed by Cox, are physical entities, such as physical locations in a network, or switches on a network. Cox simply maps these nodes as they exist in the physical world. This is not surprising, as the

information displayed by Cox is information about the operation of a network. In each and every description and example shown by Cox, the physical attributes of the network define the nodes of the graphical display, and Cox is thus entirely unconcerned with any analysis of the entities to determine how they are to be mapped on the surface. Cox simply maps them as they are laid out in the physical network, which is a perfectly logical approach when mapping out a graphical representation of a network.

In contradistinction, the present invention, as previously claimed in claim 25 and now claimed in amended claim 1, no analogue to Cox's physical network exists. The entities that are mapped on the surface are not temporal in nature. While they might include descriptions of real objects, places or people, as entities that are to be represented in the graphical display, they exist merely as concepts, contained within in written documents, which are then analyzed according to the method of the present invention. Thus, unlike Cox, their relative positions are not fixed in advance through some physical analogue like a network, and the present invention must provide some method for determining the relative positions of these entities, or nodes, in a graphical representation.

Cox is not confronted with this problem, and, not surprisingly, nowhere does Cox remotely consider any method whatsoever for determining the positions of the nodes in the graphical representation, other than simply using the actual physical layout of the networks Cox is representing in Cox's graphical display. Nowhere does Cox remotely consider any method whatsoever for mapping entities onto the surface (creating nodes) in any manner that considers in any way other than the temporal relationship between the nodes as they exist in the physical world. Since Cox is unconcerned with mapping entities such as document databases onto a surface, Cox has no reason to remotely consider techniques for mapping them, such as "two-way document/topic iteration logic," as is now claimed in claim 1, and all remaining claims by virtue of dependency.

The examiner recites that Cox teaches this mapping, citing column 3, lines 48-67, and asserting that Cox "teaches topic iteration by disclosing the mapping of network

between caller and callee.” (sic) This assertion by the examiner is plainly in error. In the first instance, the passage cited by the examiner does not make any reference to “mapping the network between caller and callee,” but even if it did, such would be entirely irrelevant to the step of mapping entities onto a surface “by two-way document/topic iteration logic.” The step of mapping entities onto a surface “by two-way document/topic iteration logic” only makes sense if the entities are being derived from a database containing documents written in some interpretable language. The applicant provides a lengthy explanation for the process for parsing such databases beginning at page 7, line 16 and concluding at page 13, line 54. A network between a “caller” and a “callee” presents no analogous database that needs to be parsed to map the entities within the database onto the graphical representation. Indeed, at the precise passage cited by the examiner to reject claim 25, Cox states that the nodes “are thus the countries, and the links connect the pairs of countries with traffic.” Plainly, Cox is simply representing aspects of the physical world, and is not parsing anything, much less parsing a database of documents by “two-way document/topic iteration logic.”

As it is axiomatic that a proper rejection under 35 U.S.C. 102(e) must contain each and every limitation of the claim, (“[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration” W.L. Gore & Assocs. V. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303, 313 (Fed. Cir. 1983), Cox cannot provide the basis for a rejection of prior claim 25, now amended claim 1, and all remaining claims by virtue of dependency. Cox does not remotely teach the step of “mapping the at least two entities onto a surface by two-way document/topic iteration logic.” Accordingly, the applicant respectfully requests that the examiner withdraw her prior rejection of claim 25 by indicating the allowance of now amended claim 1, and all remaining claims by virtue of dependency, and allow the claims to issue.

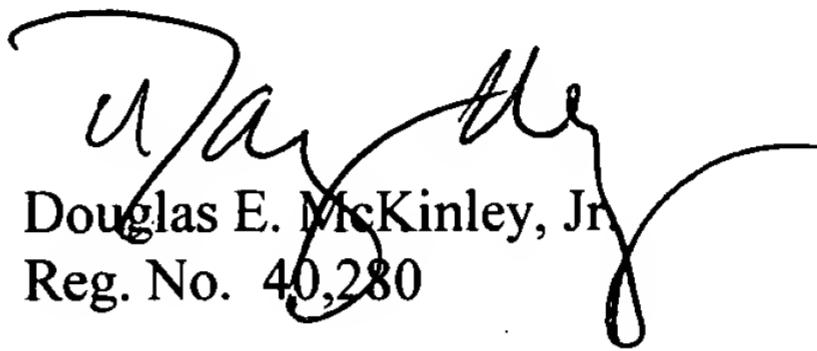
### **Closure**

Applicant has made an earnest attempt to place the above referenced application in condition for allowance and action toward that end is respectfully requested. If the not

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Reply to Office action of December 15, 2003

allowed, the applicant respectfully requests that the amendments to the claims set forth herein nevertheless be entered into the record. Should the Examiner have any further observations or comments, she is invited to contact the undersigned for resolution.

Respectfully submitted,

  
Douglas E. McKinley, Jr.

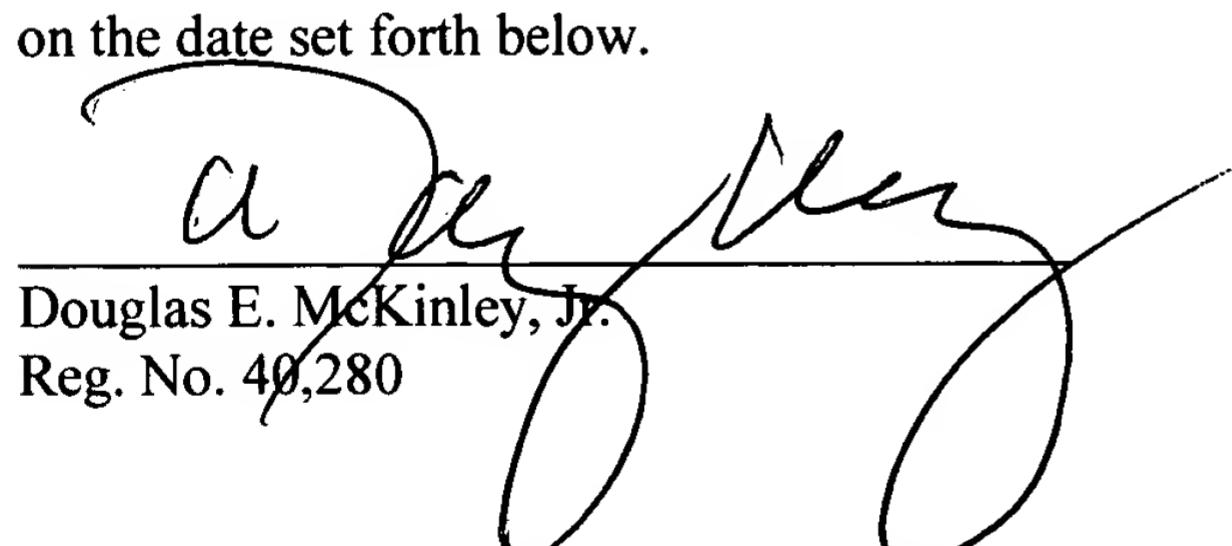
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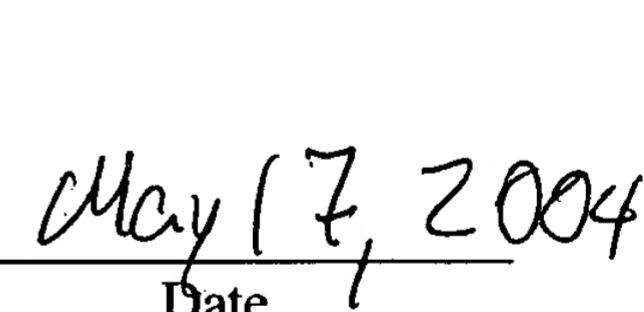
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The undersigned hereby certifies that the forgoing Amendment dated May 17, 2004 in reply to the office action of December 15, 2003, together with PTO Form PTO SB17 (1 page, 2 copies) and a return postcard are being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to

Mail Stop Amendment  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

on the date set forth below.

  
Douglas E. McKinley, Jr.  
Reg. No. 40,280

  
May 17, 2004  
Date